

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Duke Energy Carolinas, LLC
for Approval of Energy Efficiency Plan Including an
Energy Efficiency Rider and Portfolio of Energy
Efficiency Programs

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 358 - E

(Please type or print)

Submitted by: Robert E. Tyson, Jr.

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DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2007-358-E

IN THE MATTER OF:

Application of Duke Energy Carolinas,)	WAL-MART STORES EAST,
LLC for Approval of Energy Efficiency)	LP'S DATA REQUESTS TO
Plan Including an Energy Efficiency Rider)	DUKE ENERGY CAROLINAS,
And Portfolio of Energy Efficiency Programs)	LLC

Item No.	Description
	As referenced on page 28 of the Direct Testimony of Stephen Farmer, please provide responses to data requests 1 through 4. Please provide each calculation in Microsoft Excel format with all cells and formulae intact.
WM 1-1.	<p>Please provide the complete derivation, including all assumptions, of the following values:</p> <ul style="list-style-type: none">a. South Carolina residential revenue requirement of \$7,919,560;b. Projected 2008 SC residential retail sales of 6,429,079,000 kWh;c. Projected 2008 SC residential EE Impacts of 4,251,000 kWh;d. South Carolina residential Rider EE rate of \$0.001233/kWh;e. South Carolina non-residential revenue requirement of \$15,829,264;f. Projected 2008 SC non-residential retail sales of 15,541,312,000 kWh;g. Projected 2008 SC non-residential EE impacts of 2,053,000 kWh; andh. South Carolina non-residential Rider EE rate of \$0.001019/kWh.
WM 1-2.	Please identify the individual programs that are expected to produce the Projected 2008 SC residential EE Impacts of 4,251,000 kWh and the Projected 2008 SC non-residential EE impacts of 2,053,000 kWh
WM 1-3.	Please provide the complete derivation, including all assumptions, of the average cost per kWh for each kWh saved under the Save-A-Watt program for residential customers and non-residential customers for 2008.
WM 1-4.	Given the Projected 2008 residential EE Impacts of 4,251,000 kWh and the Projected 2008 non-residential EE Impacts of 2,053,000 kWh, please provide the complete derivation, including all assumptions, of Duke Energy's projected 2009 revenue requirement for residential and non-residential customers.
WM 1-5.	As referenced on page 7, lines 14 through 17, of the Direct Testimony of Stephen Farmer, please provide the QF rates used to calculate Rider EE.

- WM 1-6. As referenced on page 16, lines 8 through 21, of the Direct Testimony of Stephen Farmer:
- a. Does the calculation of Rider EE either include or constitute an earned return on avoided energy costs?
 - b. If the response to (a) is yes, is that return the weighted cost of capital (and if not, what is that return)?
 - c. Please provide the weighted cost of capital (or other return used) for the 2008 calculation.
 - d. Does Duke Energy earn a return on energy costs incurred for utility-owned generation resources or on power purchase agreements?
- WM 1-7. As referenced on page 11, lines 20 through 21, of the Direct Testimony of Richard Stevie, please describe whether a large customer, which implements a significant amount of energy efficiency on its own outside of incentive programs, would be defined as a “free rider” or “free driver” under the evaluation methodology of Save-A-Watt.
- WM 1-8. As referenced on page 13, lines 15 through 19, of the Direct Testimony of Richard Stevie, are the avoided costs included in the calculation of Rider EE the avoided hourly energy costs from the IRP? If yes, please define the relationship between the avoided hourly energy costs from the IRP and the avoided cost rates detailed in South Carolina Schedule PP.
- WM 1-9. As referenced on page 18, lines 5 through 6, of the Direct Testimony of Richard Stevie, please describe Duke Energy’s historic handling of energy efficiency programs that do not meet the RIM test.
- WM 1-10. As referenced on page 24, lines 15 through 17, of the Direct Testimony of Richard Stevie, please describe the process to adjust the load impacts of free riders and free drivers.
- WM 1-11. As referenced on page 8, lines 13 through 15, of the Direct Testimony of Theodore Schultz, does the Save-A-Watt methodology allow Duke Energy to earn a return on avoided energy costs?
- WM 1-12. As referenced on page 20, lines 14 through 15, of the Direct Testimony of Theodore Schultz:
- a. Is “Year 1” 2008?
 - b. How many of the 180,000 system MWh are allocated to South Carolina?
 - c. Please provide a table for each date and hour of Year 1 that includes, for each hour, the number of MWh from the response to (b) and the hourly avoided cost in that hour.

- WM 1-13. As referenced on page 9, lines 21 and 22, of Exhibit No. 1 of the Direct Testimony of Theodore Schultz, what is the limit of the incentives available to each customer?
- WM 1-14. As referenced on page 9, lines 9 through 15, of the Direct Testimony of Janice Hager, what is the result of the IRP analysis when the actual program costs are used?
- WM 1-15. As referenced on page 10, lines 11 through 17, of the Direct Testimony of Janice Hager, does the 2008 revenue requirement for Save-A-Watt reflect the total MW of capacity from energy efficiency in 2008 or the incremental capacity added to the previous 700 MW?
- WM 1-16. As referenced on page 17, lines 2 though 5, of the Direct Testimony of Jane Sadowsky:
- a. What portion of the initial funding for the Save-A-Watt program in South Carolina will come from equity capital?
 - b. What portion of the initial funding for the Save-A-Watt program in South Carolina will be debt financed?
- WM 1-17. As referenced on page 15, lines 1 through 10, of the Direct Testimony of Jane Sadowsky, please compare the financing of the Save-A-Watt program to that of a generation resource.
- WM 1-18. As referenced on page 30, lines 17 through 18, of the Direct Testimony of Judah Rose, please compare the \$/MWh energy efficiency costs of the Save-A-Watt program in South Carolina to the reported national average. Please provide a complete derivation of the costs, including all assumptions.
- WM 1-19. As referenced on page 20, lines 2 through 4, of the Direct Testimony of Jane Sadowsky, please detail how Save-A-Watt will shift the immediate burden of capital investment from the customer to the utility.
- WM 1-20. As referenced on page 20, lines 20 through 21, of the Direct Testimony of Jane Sadowsky:
- a. Please provide the methodology by which the amounts invested will be put into rate base.
 - b. Does the amount put into rate base include avoided energy costs?

- WM 1-21. Please provide the following for 2005, 2006, and 2007:
- The amount of money spent annually on energy efficiency and demand response programs by Duke Energy in South Carolina;
 - The resulting kW saved; and
 - The resulting kWh saved.
- WM 1-22. Please provide, for each month of the first 12 months in which Save-A-Watt would be implemented:
- Duke Energy's anticipated expenditures for energy efficiency and demand response programs;
 - Anticipated revenues from Rider EE;
 - Anticipated kW saved; and
 - Anticipated kWh saved.
- WM 1-23 Please describe how Duke Energy incorporates the impacts of free rider ship in their program impacts and calculations.
- WM 1-24 Would Duke Energy claim energy savings from energy efficiency measures implemented by companies in which Duke energy efficiency incentives were not paid?

Respectfully submitted,

s/Robert E. Tyson, Jr.
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Attorneys for Wal-Mart Stores, Inc.

December 19, 2007

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **Wal-Mart Stores East, LP's Data Requests to Duke Energy Carolinas, LLC** in Docket No. 2007-358-E upon the following persons by causing copies of the same to be emailed (where applicable) and placed in an envelope with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

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This 19 day of December, 2007.

s/Tracy R. Murchison
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